Facility Name: **Superior Landfill and Recycling Center**
City: Savannah
County: Chatham
AIRS #: 04-13-051-00205

Application #: TV-22742
Date Application Received: July 24, 2014
Permit No: 4953-051-0205-V-03-0

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Introduction

This narrative is being provided to assist the reader in understanding the content of referenced operating permit. Complex issues and unusual items are explained here in simpler terms and/or greater detail than is sometimes possible in the actual permit. The permit is being issued pursuant to: (1) Georgia Air Quality Act, O.C.G.A § 12-9-1, et seq. and (2) Georgia Rules for Air Quality Control, Chapter 391-3-1, and (3) Title V of the Clean Air Act. Section 391-3-1-.03(10) of the Georgia Rules for Air Quality Control incorporates requirements of Part 70 of Title 40 of the Code of Federal Regulations promulgated pursuant to the Federal Clean Air Act. The narrative is intended as an adjunct for the reviewer and to provide information only. It has no legal standing. Any revisions made to the permit in response to comments received during the public participation and EPA review process will be described in an addendum to this narrative.

I. Facility Description

A. Facility Identification

1. Facility Name

Superior Landfill and Recycling Center

2. Parent/Holding Company Name

Waste Management of Georgia, Inc.

3. Previous and/or Other Name(s)

None

4. Facility Location

3001 Little Neck Road
Savannah, Georgia 31419

5. Attainment, Non-attainment Area Location, or Contributing Area

The landfill is located in Chatham County which is in attainment for all criteria pollutants.

B. Site Determination

Superior Landfill consists of two adjacent sites. Site 1 was constructed in 1983 and closed in 1995. Site 2 was constructed in 1993 and is still in operation. The two sites comprise one landfill for the purposes of Title V and NSPS Subpart WWW.

There are no other facilities which could possibly be contiguous or adjacent and under common control.

C. Existing Permits

Table 1 below lists all current Title V permits, all amendments, 502(b)(10) changes, and off-permit changes, issued to the facility, based on a comparative review of form A.6, Current Permits, of the Title V application and the "Permit" file(s) on the facility found in the Air Branch office.

Table 1: List of Current Permits, Amendments, and Off-Permit Changes

Permit Number and/or Off-Permit Change	Date of Issuance/ Effectiveness	Purpose of Issuance
4953-051-0205-V-02-0	January 27, 2010	Renewal Title V Permit
4953-051-0205-V-02-1	July 8, 2014	Lateral expansion and revision to periodic reporting deadlines.

D. Process Description

1. SIC Codes(s)

4953

The SIC Code(s) identified above were assigned by EPD's Air Protection Branch for purposes pursuant to the Georgia Air Quality Act and related administrative purposes only and are not intended to be used for any other purpose. Assignment of SIC Codes by EPD's Air Protection Branch for these purposes does not prohibit the facility from using these or different SIC Codes for other regulatory and non-regulatory purposes.

Should the reference(s) to SIC Code(s) in any narratives or narrative addendum previously issued for the Title V permit for this facility conflict with the revised language herein, the language herein shall control; provided, however, language in previously issued narratives that does not expressly reference SIC Code(s) shall not be affected.

2. Description of Product(s)

No products are produced. Superior Landfill and Recycling Center receives, manages and disposes of solid waste.

3. Overall Facility Process Description

The Superior Landfill & Recycling Center receives, manages, and disposes of solid waste in accordance with its solid waste permit. The waste is deposited directly into the landfill and covered with fill soil or other approved alternate daily cover (ADC). Landfill gas (LFG) is produced from the decomposition of the deposited waste. The LFG is collected in a gas collection and control system (GCCS). The collected gas is sent to either two open flares or a landfill gas to energy (LFGTE) facility. The LFGTE facility consists of a LFG treatment system and eight LFG-fired internal combustion engines used to generate electricity.

4. Overall Process Flow Diagram

The facility provided a process flow diagram in their Title V permit application.

E. Regulatory Status

1. PSD/NSR

Superior Landfill is a major source under the PSD regulations of 40 CFR 52.21. Potential emissions of carbon monoxide (CO) and sulfur dioxide (SO_2) exceed the 250 ton per year PSD major source threshold. Potential emissions of all other pollutants are below 250 tons per year. The landfill is not one of the 28 listed source categories that have a 100 tpy PSD major source threshold as per 52.21.

2. Title V Major Source Status by Pollutant

Table 2: Title V Major Source Status

Pollutant	Is the Pollutant Emitted?	If emitted, what is the facility's Title V status for the pollutant?		
		Major Source Status	Major Source Requesting SM Status	Non-Major Source Status
PM	✓			✓
PM_{10}	✓			✓
$PM_{2.5}$	✓			✓
SO_2	✓	✓		
VOC	✓			✓
NO_x	✓	✓		
CO	✓	✓		
TRS	✓			✓
H_2S	✓			✓
Individual HAP	✓			✓
Total HAPs	✓			✓

3. MACT Standards

The Landfill MACT, 40 CFR Part 63 Subpart AAAA, is applicable to each area source MSW landfill with a design capacity greater than or equal to 2.5 million megagrams (Mg) and 2.5 million cubic meters (m3) and having estimated uncontrolled NMOC emissions exceeding 50 megagrams per year (Mg/yr) or if the landfill is a bioreactor. This landfill has uncontrolled NMOC emissions of greater than 50 Mg/yr and a design capacity greater than 2.5 million Mg. Therefore, this MACT standard is applicable to the landfill.

The facility is subject to 40 CFR 63 Subpart ZZZZ – "National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines," for operation of the IC engines.

4. Program Applicability (AIRS Program Codes)

Program Code	Applicable (y/n)
Program Code 6 - PSD	No
Program Code 8 – Part 61 NESHAP	Yes
Program Code 9 - NSPS	Yes
Program Code M – Part 63 NESHAP	Yes
Program Code V – Title V	Yes

Regulatory Analysis

II. Facility Wide Requirements

A. Emission and Operating Caps:

None applicable.

B. Applicable Rules and Regulations

40 CFR 60 Subpart WWW – Standards of Performance for Municipal Solid Waste Landfills

This rule is applicable to each municipal solid waste landfill that has a design capacity greater than 2.5 million megagrams (Mg) or 2.5 million cubic meters (m^3), if the landfill commenced construction, reconstruction or modification on or after May 30, 1991. Superior Landfill and Recycling Center received a Solid Waste Amendment on June 18, 1993 that increased the design capacity to 7.96 million cubic yards (6.09 million cubic meters). The design capacity has, subsequently, been increased to 11.7 million cubic yards (8.9 million cubic yards). This landfill, therefore, is subject to NSPS, 40 CFR 60 Subpart WWW - Standards of Performance for Municipal Solid Waste Landfills. Because the NMOC emissions from Superior Landfill and Recycling Center exceeded 50 megagrams per year, the landfill has installed a gas collection and control system.

40 CFR 61 Subpart M – NESHAP for Asbestos

Superior Landfill and Recycling Center accepts asbestos-containing waste and is, therefore, subject to the asbestos NESHAP in 40 CFR 61, Subpart M. As long as this MSW Landfill remains active, it is required to comply with the provisions of 40 CFR 61.154 – "Standard for Active Waste Disposal Sites", including all reporting and record keeping requirements. Upon closure, the facility will be required to comply with 40 CFR 61.151 – "Standard for Inactive Waste Disposal Sites for Asbestos Mills and Manufacturing and Fabricating Operations".

40 CFR Part 63 Subpart AAAA – National Emission Standards for Municipal Solid Waste Landfills

This rule applies to each landfill that received waste after November 6, 1987, that is a major source, is co-located with a major source, or is subject to the control requirements of 40 CFR 60 Subpart WWW. This landfill is subject to this rule because the landfill is required by NSPS Subpart WWW to install and operate a landfill gas collection and control system (GCCS).

C. Compliance Status

There are no non-compliance issues at the facility.

D. Permit Conditions

The requirements of Conditions 2.2.1 through 2.2.6 of Permit No. 4953-135-0219-V-02-0 have been carried over to this permit. The language of these conditions has been updated to the most recent version of these conditions used by the Division.

The requirements of Conditions 2.2.5 and 2.2.6 of Permit No. 4953-135-0219-V-02-0 are in new Condition 2.2.1. This condition establishes the applicability of 40 CFR 60 Subparts A and WWW to the landfill.

The requirements of Conditions 2.2.1 and 2.2.2 of Permit No. 4953-135-0219-V-02-0 are in new Condition 2.2.2. This condition establishes the applicability of 40 CFR 61 Subparts A and M to the landfill.

The requirements of Conditions 2.2.3 and 2.2.4 of Permit No. 4953-135-0219-V-02-0 are in new Condition 2.2.3. This condition establishes the applicability of 40 CFR 63 Subparts A and AAAA to the landfill.

III. Regulated Equipment Requirements

A. Equipment List for the Process

Emission Units		Specific Limitations/Requirements		Air Pollution Control Devices	
ID No.	**Description**	**Applicable Requirements/Standards**	**Corresponding Permit Conditions**	**ID No.**	**Description**
LF	Landfill	40 CFR 60 Subpart A 40 CFR 60 Subpart WWW 40 CFR 61 Subpart A 40 CFR 61 Subpart M 40 CFR 63 Subpart A 40 CFR 63 Subpart AAAA 391-3-1-.02(2)(n)	2.2.1, 2.2.2, 2.2.3, 3.3.1, 3.3.2, 3.3.3, 3.3.4, 3.4.1, 3.4.2,4.2.1, 4.2.2, 5.2.1, 5.2.2, 5.2.3, 5.2.4, 5.2.5, 5.2.6, 5.2.7, 5.2.8, 5.2.9, 6.1.7, 6.2.1, 6.2.2, 6.2.3, 6.2.4, 6.2.5, 6.2.6, 6.2.7, 6.2.8, 6.2.9, 6.2.10, 6.2.11, 6.2.12, 6.2.13, 6.2.14, 6.2.15, 6.2.16, 7.6.1	GCCS; TS; F1 and F2	Landfill Gas Collection and Control System (GCCS); Landfill Gas Treatment System; Open Flare(s)

Emission Units		Specific Limitations/Requirements		Air Pollution Control Devices	
ID No.	Description	Applicable Requirements/Standards	Corresponding Permit Conditions	ID No.	Description
E1	Caterpillar 3516 Internal Combustion Engine No. 1	391-3-1-.02(2)(b) 391-3-1-.02(2)(g) 40 CFR 63 Subpart A 40 CFR 63 Subpart ZZZZ	3.3.5, 3.3.6, 3.4.3, 3.4.4, 4.2.3, 5.2.1, 5.2.10, 5.2.11, 6.1.7, 6.2.17	None	None
E2	Caterpillar 3516 Internal Combustion Engine No. 2	391-3-1-.02(2)(b) 391-3-1-.02(2)(g) 40 CFR 63 Subpart A 40 CFR 63 Subpart ZZZZ	3.3.5, 3.3.6, 3.4.3, 3.4.4, 4.2.3, 5.2.1, 5.2.10, 5.2.11, 6.1.7, 6.2.17	None	None
E3a	Caterpillar 3516 Internal Combustion Engine No. 3a	391-3-1-.02(2)(b) 391-3-1-.02(2)(g) 40 CFR 63 Subpart A 40 CFR 63 Subpart ZZZZ	3.3.5, 3.3.6, 3.3.7, 3.3.8, 3.3.9, 3.3.10, 3.3.11, 3.4.3, 3.4.4, 4.2.3, 5.2.1, 5.2.10, 5.2.11, 6.1.7, 6.2.17, 6.2.18, 6.2.19	None	None
E4	Caterpillar 3516 Internal Combustion Engine No. 4	391-3-1-.02(2)(b) 391-3-1-.02(2)(g) 40 CFR 63 Subpart A 40 CFR 63 Subpart ZZZZ	3.3.5, 3.3.6, 3.4.3, 3.4.4, 4.2.3, 5.2.1, 5.2.10, 5.2.11, 6.1.7, 6.2.17	None	None
E5	Caterpillar 3516 Internal Combustion Engine No. 5	391-3-1-.02(2)(b) 391-3-1-.02(2)(g) 40 CFR 63 Subpart A 40 CFR 63 Subpart ZZZZ	3.3.5, 3.3.6, 3.4.3, 3.4.4, 4.2.3, 5.2.1, 5.2.10, 5.2.11, 6.1.7, 6.2.17	None	None
E6	Caterpillar 3516 Internal Combustion Engine No. 6	391-3-1-.02(2)(b) 391-3-1-.02(2)(g) 40 CFR 63 Subpart A 40 CFR 63 Subpart ZZZZ	3.3.5, 3.3.6, 3.4.3, 3.4.4, 4.2.3, 5.2.1, 5.2.10, 5.2.11, 6.1.7, 6.2.17	None	None
E7	Caterpillar 3516 Internal Combustion Engine No. 7	391-3-1-.02(2)(b) 391-3-1-.02(2)(g) 40 CFR 63 Subpart A 40 CFR 63 Subpart ZZZZ	3.3.5, 3.3.6, 3.4.3, 3.4.4, 4.2.3, 5.2.1, 5.2.10, 5.2.11, 6.1.7, 6.2.17	None	None
E8	Caterpillar 3516 Internal Combustion Engine No. 8	391-3-1-.02(2)(b) 391-3-1-.02(2)(g) 40 CFR 63 Subpart A 40 CFR 63 Subpart ZZZZ	3.3.5, 3.3.6, 3.4.3, 3.4.4, 4.2.3, 5.2.1, 5.2.10, 5.2.11, 6.1.7, 6.2.17	None	None

B. Equipment & Rule Applicability

Emission and Operating Caps:

None applicable.

Rules and Regulations Assessment:

40 CFR 60 Subpart WWW – Standards of Performance for Municipal Solid Waste Landfills

Since this landfill was modified after the NSPS Subpart WWW effective date (May 30, 1991) and it has a design capacity greater than 2.5 million cubic meters (3.2 million cubic yards), it is subject to the New Source Performance Standards (NSPS) 40 CFR 60, Subpart WWW – Standards of Performance for MSW Landfills. This rule required the installation of a gas collection and control system (GCCS). Landfill gases collected by the GCCS are routed to either a landfill gas treatment system for subsequent combustion in one of eight engines or one of two open flares operated in accordance with 40 CFR 60.18.

Georgia Rule 391-3-1-.02(2)(n) – Fugitive Emissions

This rule requires the facility to minimize fugitive dust from the facility. This includes using water or chemicals for controlling dust on construction operations, grading of roads, and the clearing of land; covering at all times, when in motion, open bodied trucks transporting material likely to give rise to airborne dust; application of suitable material on dirt roads, materials, stockpiles, and other similar surfaces. Also per this rule, a landfill may not discharge fugitive dust, which exhibits opacity equal to or greater than 20 percent.

40 CFR 60 Subpart JJJJ – Standards of Performance for Stationary Spark Ignition Internal Combustion Engines and 40 CFR 63 Subpart ZZZZ – National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines

The eight landfill gas-fired internal combustion (IC) engines are potentially subject to 40 CFR 60 Subpart NSPS Subpart JJJJ (NSPS for spark ignition engines) and 40 CFR 63 Subpart ZZZZ (RICE MACT). The engines at this landfill are 1,148 horsepower natural gas-fired lean burn engines. Lean burn landfill gas-fired engines with a maximum engine power between 500 and 1,350 HP are subject to the NSPS if the owner commenced construction after June 12, 2006 and the manufacture date of the engine is January 1, 2008 or later. At an area source of HAPs, these engines are new if they were manufactured after June 12, 2006 and existing if they were manufactured before this date. The manufactured date for these engines is:

Engine	Manufactured Date	Subject to NSPS	MACT Status
E1	5/22/2007	No	New
E2	5/22/2007	No	New
E3a	10/27/1997	No	Existing
E4	4/17/2007	No	New
E5	6/14/2007	No	New
E6	4/13/2007	No	New
E7	6/14/2007	No	New
E8	4/11/2007	No	New

New engines at an area source of HAPs comply with the RICE MACT by complying with the NSPS. Because Engines E1, E2, E4, E5, E6, E7, and E8 are not subject to the NSPS, no requirements under the MACT or NSPS apply. Because Engine E3a is and existing engine in the MACT, it must meet work practice and record keeping requirements.

Georgia Rule 391-3-1-.02(2)(g) – Sulfur Dioxide

Rule (g) specifies the maximum sulfur content in fuels used for combustion. Paragraph 2 of this rule limits the maximum sulfur content to 2.5 percent (by weight) in all fuels fired in a combustion source below 100 million Btu per hour heat input rate. The heat input capacity for each engine is 9.11 million Btu per hour. As such, the landfill gas may not contain more than 2.5 percent sulfur by weight.

Georgia Rule 391-3-1-.02(2)(b) – Visible Emissions

Rule (b) requires that visible emissions from an air contaminant source be limited to a maximum opacity of 40 percent. This standard is applicable to sources subject to some other emission limitation under section 391-3-1-.02. Since the engines in the proposed landfill gas to energy plant will be subject to Rule (g), the visible emission standard in this rule will also be applicable to each engine.

Solidification of Liquid Waste (S)

The Solidification of Liquid Waste emission unit has been moved to the Insignificant Activities Based on Emission Levels section in Attachment B of the permit.

C. Permit Conditions

Permit Conditions 3.3.1, 3.3.2, 3.3.4, 3.3.5, 3.4.2, 3.4.3, 3.4.4, and 3.4.5 have been carried from the existing permit and renumbered as 3.3.1, 3.3.2, 3.3.5, 3.3.6, 3.4.4, 3.4.1, 3.4.2, and 3.4.3, respectively. In some cases, the language of these conditions has been updated to the most recent version of these conditions used by the Division.

Condition 3.3.1 (Condition 3.3.1 in existing permit) details the general control requirements of 40 CFR Subpart WWW for the GCCS.

Condition 3.3.2 (Condition 3.3.2 in existing permit) requires that the open flares be designed and operated in accordance with 40 CFR 60.18.

Condition 3.3.3 is new in this permit. It contains the requirement to implement a startup, shutdown, and malfunction plan per 40 CFR 63 Subpart AAAA.

Condition 3.3.4 is new in this permit. It contains the bioreactor requirements from 40 CFR 63 Subpart AAAA if liquid (other than leachate) is added to the landfill in a controlled fashion.

Condition 3.3.5 (Condition 3.3.4 in existing permit) specifies the general applicability of 40 CFR 63 Subparts A and ZZZZ to the engines.

Condition 3.3.6 (Condition 3.3.5 in existing permit) limits NOx and CO emissions from the engines to ensure that the landfill remains a minor source for PSD purposes.

Conditions 3.4.2 and 3.4.3 includes the fugitive dust requirements per Georgia Rule (n).

Conditions 3.3.7 through 3.3.11 are new and incorporate RICE MACT conditions for IC engine E3a.

Condition 3.3.7 specifies the work practice standards that are applicable for the engine from Table 2d Item 13 of Subpart ZZZZ.

Condition 3.3.8 contains the RICE MACT requirement that the time for startup be minimized and startup is limited to 30 minutes.

Condition 3.3.9 specifies that the Permittee operate and maintain the engine in accordance with the manufacturer's written instructions, per Subpart ZZZZ.

Condition 3.3.10 provides that the facility may extend the oil change requirement specified in Condition 3.3.7 provided an oil sampling program is conducted as specified in 40 CFR 63.6625(j).

Condition 3.3.11 specifies that the engine is subject to the requirements specified in 40 CFR 63.6605.

Conditions 3.4.1 and 3.4.2 (Conditions 3.4.3 and 3.4.4 in the existing permit) limit fugitive dust and its opacity, in accordance with Rule (n).

Condition 3.4.3 (Condition 3.4.5 in the existing permit) limits the fuel sulfur content, in accordance with Rule (g).

Condition 3.4.4 (Condition 3.4.2 in the existing permit) limits the visible emissions from the engines, in accordance with Rule (b).

Conditions 3.3.3, 3.3.6, and 3.3.7 in the existing permit have been deleted because they contain requirements from 40 CFR 60 Subpart JJJJ which are not applicable.

Condition 3.4.1 in the existing permit has been deleted because it contained the Rule (e) requirement for the Solidification of Liquid Waste emission unit that has been moved to the Insignificant Activities Based on Emission Levels section.

IV. Testing Requirements (with Associated Record Keeping and Reporting)

A. General Testing Requirements

The permit includes a requirement that the Permittee conduct performance testing on any specified emission unit when directed by the Division. Additionally, a written notification of any performance test(s) is required 30 days (or sixty (60) days for tests required by 40 CFR Part 63) prior to the date of the test(s) and a test plan is required to be submitted with the test notification. Test methods and procedures for determining compliance with applicable emission limitations are listed and test results are required to be submitted to the Division within 60 days of completion of the testing.

B. Specific Testing Requirements

Superior Landfill and Recycling Center uses open flares to control NMOC emissions from the landfill. The initial test requirements for open flares is included in Condition 4.2.1 (Condition 4.2.1 in existing permit).

Superior Landfill and Recycling Center is not allowed to remove its GCCS or the control devices until the landfill ceases to accept waste and the NMOC emission rate falls below 50 megagrams per year. The exact procedures for demonstrating that the NMOC emission rate has fallen to a sufficiently low level are found in 40 CFR 60.754(b). Condition 4.2.2 (Condition 4.2.2 in the existing permit) includes this requirement.

Condition 4.2.3 (Condition 4.2.3 in the existing permit) requires the Permittee to conduct CO and NOx emissions testing to demonstrate compliance with the emission limits whenever an IC engine is rebuilt or swapped out (like-for-like).

The requirements of Condition 4.2.4 in the existing permit have been merged into Condition 6.1.7, and therefore, Condition 4.2.4 has been removed from this permit.

Conditions 4.2.6 and 4.2.7 of the existing permit dealt with testing for 40 CFR 60 Subpart JJJJ, which does not apply to the IC engines. These conditions have, therefore, been removed.

V. Monitoring Requirements

A. General Monitoring Requirements

Condition 5.1.1 requires that all continuous monitoring systems required by the Division be operated continuously except during monitoring system breakdowns and repairs. Monitoring system response during quality assurance activities is required to be measured and recorded. Maintenance or repair is required to be conducted in an expeditious manner.

B. Specific Monitoring Requirements

Superior Landfill and Recycling Center is subject to 40 CFR 60 Subpart WWW. The landfill uses open flares and a landfill gas treatment system. For open flares, Subpart WWW requires monitoring for the continuous presence of a pilot light is required. The landfill is also required to monitor for the flow to the control devices (treatment system or open flares) by installing a continuous (at least one reading every 15 minutes) flow device.

For each wellhead in the collection system, the landfill is required to install a sample port and a temperature measuring device or access port. Once each month, the landfill is required to determine the gauge pressure, the temperature, and oxygen or nitrogen concentration in each wellhead. Excessive pressure, temperature, or gas concentration must be reported as an exceedance. For each exceedance, corrective action and remonitoring must be conducted on a prescribed schedule.

Once per quarter, the landfill is required to monitor methane concentrations on the surface of the landfill. Excessive concentrations (more than 500 ppm above background concentration) will require reporting of an exceedance, corrective action, and remonitoring on a prescribed schedule. A program to monitor for cover integrity and making repairs, on a monthly basis, is also required.

Permit Conditions 5.2.1 through 5.2.11 have been carried from the existing permit. In some cases, the language of these conditions has been updated to the most recent version of these conditions used by the Division.

Condition 5.2.1 contains the requirements to monitor (1) presence of a pilot light on an open flare, (2) flow rate of both control devices, and (3) manifold temperature, maniflold pressure, ignition timing, and engine load for the IC engines.

Conditions 5.2.2 through 5.2.6 contain the requirements for wellhead monitoring for temperature, pressure, and oxygen or nitrogen. Conditions 5.2.7 and 5.2.8 contain the requirements for surface methane monitoring. Condition 5.2.9 contains a requirement to monitor landfill cover integrity.

Condition 5.2.10 contains a monitoring plan for NOx and CO from the IC engines.

Condition 5.2.11 requires that the NOx and CO emissions from one engine be verified each year. The engine to be verified rotates to a new engine each year.

C. Compliance Assurance Monitoring (CAM)

Not Applicable

VI. Record Keeping and Reporting Requirements

A. General Record Keeping and Reporting Requirements

The Permit contains general requirements for the maintenance of all records for a period of five years following the date of entry and requires the prompt reporting of all information related to deviations from the applicable requirements. Records, including identification of any excess emissions, exceedances, or excursions from the applicable monitoring triggers, the cause of such occurrence, and the corrective action taken, are required to be kept by the Permittee and reporting is required on a semiannual basis.

B. Specific Record Keeping and Reporting Requirements

Superior Landfill and Recycling Center is subject to 40 CFR 60 Subpart WWW which requires the landfill to keep accessible records of design capacity and waste in place and may exclude areas containing non-degradable waste from the GCCS if sufficient records are kept. The landfill accepts asbestos-containing waste and is, therefore, subject to 40 CFR 61 Subpart M. The landfill is required to comply with 40 CFR 61.154 and, upon closure, submit records of asbestos disposal locations and quantities. The landfill is also subject to 40 CFR 63 Subpart AAAA which requires the implementation of a startup, shutdown, and malfunction (SSM) plan.

Additionally, the RICE MACT (40 CFR 63 Subpart ZZZZ), which applies to IC engine E3a, requires some record keeping requirements.

The requirements in Section 6.2 of the existing permit have been carried over to this permit. The conditions have been updated to the most recent version of the conditions and the order of the conditions have been revised.

Condition 6.2.1 (Condition 6.2.1 in existing permit) requires a report when the landfill stops accepting waste in order to close the landfill.

Condition 6.2.2 (Condition 6.2.2 in existing permit) requires a report when the landfill removes or ceases to operate control equipment.

Condition 6.2.3 (Condition 6.2.3 in existing permit) requires that the facility keep records of the maximum design capacity of the landfill, the current amount of solid waste in place, and the year-by-year waste acceptance rate.

Condition 6.2.4 (Condition 6.2.4 in existing permit) requires records of the GCCS components.

Condition 6.2.5 (Condition 6.2.5 in existing permit) requires records of existing and planned collectors in the GCCS.

Condition 6.2.6 (Condition 6.2.7 in existing permit) requires records of GCCS exceedances.

Conditions 6.2.7 and 6.2.8 (Condition 6.2.6 in existing permit) contains requirements for excluding areas of the landfill from the GCCS design, when it is required, due to the area being nonproductive of LFG or which contain non-degradable waste.

Conditions 6.2.9 and 6.2.10 (Conditions 6.2.8 and 6.2.9 in existing permit) contain requirements from 40 CFR 61 Subpart M which are applicable if the landfill accepts asbestos-containing waste.

Condition 6.2.11 (Condition 6.2.11 in existing permit) contains requirements for the SSM Plan.

Conditions 6.2.12 through 6.2.14 (Conditions 6.2.16 through 6.2.18 in existing permit) contain requirements, which are applicable, if the landfill adds any liquid (other than leachate) to the landfill. The landfill may become subject to the bioreactor requirements in 40 CFR 63 Subpart AAAA if liquids (other than leachate) are added.

Condition 6.2.15 (Condition 6.2.10 in existing permit) requires implementing their dust suppression plan to ensure that the landfill complies with Georgia Rule (n).

Condition 6.2.16 (Condition 6.2.14 in existing permit) requires the landfill to record the date and length of time that landfill gas is sent to the open flare(s).

Condition 6.2.17 (Condition 6.2.15 in existing permit) requires the landfill to record the date and length of downtime of each IC engine.

Conditions 6.2.18 and 6.2.19 (new conditions in this permit) contain record keeping requirements for the RICE MACT (40 CFR 63 Subpart ZZZZ).

The requirements of Condition 6.2.12 in the existing permit have been merged into Condition 6.1.7d.

Condition 6.2.13 in the existing permit, which required a notification for actual startup of the IC engines has been deleted because it is no longer applicable.

Conditions 6.2.19 and 6.2.20 in the existing permit have been deleted because they contained 40 CFR 60 Subpart JJJJ requirements that do not apply.

VII. Specific Requirements

A. Operational Flexibility

Not Applicable.

B. Alternative Requirements

Not Applicable.

C. Insignificant Activities

Refer to http://gatv.georgiaair.org/GATV/default.asp for the Online Title V Application.

Refer to the following forms in the Title V permit application:

- Form D.1 (Insignificant Activities Checklist)
- Form D.2 (Generic Emissions Groups)
- Form D.3 (Generic Fuel Burning Equipment)
- Form D.6 (Insignificant Activities Based on Emission Levels of the Title V permit application)

D. Temporary Sources

Not Applicable.

E. Short-Term Activities

Condition 7.6.1 requires records of duration and frequency of the construction or closure of landfill cells, wood chipping, and concrete crushing.

F. Compliance Schedule/Progress Reports

Not Applicable.

G. Emissions Trading

Not Applicable.

H. Acid Rain Requirements

Not Applicable.

I. Stratospheric Ozone Protection Requirements

The facility does not have air conditioning or refrigeration equipment that uses ozone-depleting substances.

J. Pollution Prevention

Not Applicable.

K. Specific Conditions

Not Applicable.

VIII. General Provisions

Generic provisions have been included in this permit to address the requirements in 40 CFR Part 70 that apply to all Title V sources, and the requirements in Chapter 391-3-1 of the Georgia Rules for Air Quality Control that apply to all stationary sources of air pollution.

Template Condition 8.14.1 was updated in September 2011 to change the default submittal deadline for Annual Compliance Certifications to February 28.

Template Condition Section 8.27 was updated in August 2014 to include more detailed, clear requirements for emergency generator engines currently exempt from SIP permitting and considered insignificant sources in the Title V permit.

Template Condition Section 8.28 was updated in August 2014 to more clearly define the applicability of the Boiler MACT or GACT for major or minor sources of HAP.